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-and-

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ASHLEIGH ANGELO, et al.,

Plaintiff(s),

v.

THOMSON INTERNATIONAL,
INCORPORATED,

Defendant(s).

Case No.: 1:21-cv-01609-JLT-CDB

**DECLARATION OF ATTORNEY DAVID
COYLE**

Judge: Jennifer L. Thurston

Date Action Filed: November 4, 2021

Trial Date: July 9, 2024

AND CONSOLIDATED ACTIONS

I, David Coyle, declare as follows:

1. I am an attorney licensed in the State of Minnesota, admitted *pro hac vice* to the United States District Court for the Eastern District of California, and am one of the attorneys at Pritzker Hageman, P.A. representing Plaintiffs Amanda Erickson, John Kahlie, Jose Mena, James Thompson, Linda Mitchell, and Ashleigh Angelo. I can truthfully testify from my own knowledge as follows.

2. Attached as **Exhibit A** is a true and correct copy of excerpts from the transcript of Dr. Jonathan Ellis's October 27, 2023, deposition.

3. Attached as **Exhibit B** are true and correct copies of Dr. Jonathan Ellis's September 12, 2023, reports.

4. Attached as **Exhibit C** is a true and correct copy of CACI 1223.

5. Attached as **Exhibit D** is a true and correct copy of excerpts from the transcript of Jack Thomson's June 12, 2023, deposition.

6. Attached as **Exhibit E** is a true and correct copy of excerpts from the transcript of Frank Yiannas' July 31, 2023, deposition.

7. Attached as **Exhibit F** is a true and correct copy of Frank Yiannas' September 11, 2023, report.

8. Attached as **Exhibit G** is a true and correct copy of excerpts from the transcript of Dr. Ernest Julian's October 27, 2023, deposition.

9. Attached as **Exhibit H** is a true and correct copy of Dr. Ernest Julian's September 12, 2023, report.

10. Attached as **Exhibit I** is a true and correct copy of excerpts from the transcript of Martin Wiedmann's November 30, 2023, deposition.

11. Attached as **Exhibit J** is a true and correct copy of the July 21, 2020, Montana Public Health Laboratory results regarding Plaintiff Amanda Erickson.

12. Attached as **Exhibit K** is a true and correct copy of the July 22, 2020, McKenzie County Healthcare results regarding Plaintiff Jose Mena.

13. Attached as **Exhibit L** is a true and correct copy of the July 21, 2020, Main Line Health results regarding Plaintiff Linda Mitchell.

I declare under penalty of perjury under California, Minnesota, and Federal law that the foregoing is true and correct. Executed in Hennepin County, Minnesota on June 11, 2024.

1 Dated: June 11, 2024

PRITZKER HAGEMAN, P.A.

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3 By: 

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